IN THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF PUERTO RICO

In re:

THE FINANCIAL OVERSIGHT AND MANAGEMENT BOARD FOR PUERTO RICO, as representative of

THE COMMONWEALTH OF PUERTO RICO, et al.,

Debtors.¹

In re:

THE FINANCIAL OVERSIGHT AND MANAGEMENT BOARD FOR PUERTO RICO, as representative of

THE PUERTO RICO ELECTRIC POWER AUTHORITY (PREPA)

PROMESA Title III

No. 17 BK 3283-LTS

(Jointly Administered)

This filing relates to PREPA

POC 28744 PROMESA

Title III

Case No. 17 BK4780-LTS

UNOPPOSED MOTION FOR LEAVE TO AMEND PROOF OF CLAIM NUMBER 28744

To the Honorable United States District Judge Laura Taylor Swain:

COMES NOW, creditor, **O'Neill Security & Consultant Services, Inc.** (hereinafter "O'Neill"), by and through the undersigned attorney, to respectfully state, and request:

1. On May 29, 2018, O'Neill filed a proof of claim number 28744 based on a debt owed by PREPA for services rendered by O'Neill for the amount of \$1,946.485.38

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¹ The Debtors in these Title III Cases, along with each Debtor's respective Title III case number and the last four (4) digits of each Debtor's federal tax identification number, as applicable, are the (i) Commonwealth of Puerto Rico (Bankruptcy Case No. 17 BK 3283-LTS) (Last Four Digits of Federal Tax ID: 3481); (ii) Puerto Rico Sales Tax Financing Corporation ("COFINA") (Bankruptcy Case No. 17 BK 3284-LTS) (Last Four Digits of Federal Tax ID: 8474); (iii) Puerto Rico Highways and Transportation Authority ("HTA") (Bankruptcy Case No. 17 BK 3567-LTS) (Last Four Digits of Federal Tax ID: 3808); (iv) Employees Retirement System of the Government of the Commonwealth of Puerto Rico ("ERS") (Bankruptcy Case No. 17 BK 3566-LTS) (Last Four Digits of Federal Tax ID: 9686); (v) Puerto Rico Electric Power Authority ("PREPA") (Bankruptcy Case No. 17 BK 4780-LTS) (Last Four Digits of Federal Tax ID: 3747); and (vi) Puerto Rico Public Buildings Authority ("PBA") (Bankruptcy Case No. 19-BK-5523-LTS) (Last Four Digits of Federal Tax ID: 3801) (Title III case numbers are listed as Bankruptcy Case numbers due to software limitations).

as of July 2, 2017. After the proof of claim was filed, O'Neill received payments from the

debtor that reduced the amount owed by PREPA to O'Neill. Therefore, O'Neill requests

permission to amend POC to reduce the amount of the original POC from \$1,946,485.38

to **\$821,578.88**.

2. The contents of this motion have been discussed with Debtor's attorney,

who expressed no objections to our request.

WHEREFORE, it is respectfully requested that this Honorable Court grants movant

leave to amend its proof of claim number 28744 to correct the reduced claim amount with

any other remedy deemed just and proper.

I HEREBY CERTIFY that on this date, in accordance with Fed. R. Bankr. P.

9014(b), Fed. R. Bankr. P. 7004(b), we electronically filed the foregoing with the Clerk of

the Court using the CM/ECF System, which will send notification of such filing to counsels

of record.

RESPECTFULLY SUBMITTED.

In Ponce, Puerto Rico, on this 9th day of February 2023.

s/Elías L. Fernández Pérez ELÍAS L. FERNÁNDEZ PÉREZ

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